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**IN THE UNITED STATES DISTRICT COURT**

**FOR THE NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION**

LUDMILA GULKAROV, individually and on  
behalf of all others similarly situated,

Plaintiff,

v.

PLUM, PBC, a Delaware corporation

Defendant.

Case No. 4:21-cv-00913-YGR

**STIPULATION EXTENDING  
DEFENDANT'S RESPONSE DATE TO  
THE COMPLAINT**

Complaint Filed: 2/5/2021

Pursuant to Civil Local Rule 6-1, plaintiff Ludmila Gulkarov (“Plaintiff”) and defendant Plum, PBC (“Plum”) (collectively, the “Parties”), by and through their respective counsel of record, hereby stipulate as follows:

WHEREAS, on February 5, 2021, Plaintiff filed their initial complaint in this matter (ECF No. 1);

WHEREAS, on February 12, 2021, Plaintiff served Plum with summons and complaint;

WHEREAS, based on the February 12, 2021 service, the last day for Plum to respond to the complaint is March 5, 2021;

WHEREAS, the Parties have met and conferred and have agreed to extend the deadline by which Plum must respond to the complaint by thirty-one (31) days, such that Plum’s response will be due on or before April 5, 2021; and

WHEREAS, the Parties have not previously sought an extension to the time to respond to the complaint; and

WHEREAS, the response date to which the Parties have stipulated will not impact any previously scheduled dates in this matter;

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and between the Parties and through their respective counsel, subject to approval from the Court, that Plum shall respond to the complaint by April 5, 2021.

Dated: March 1, 2021

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by: /s/ Dale J. Giali  
Dale J. Giali  
Attorneys for Defendant  
PLUM, PBC

1 Dated: March 1, 2021

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8 by: /s/ Rebecca A. Peterson  
Rebecca A. Peterson  
Attorneys for Plaintiffs  
LUDMILA GULKAROV

11 **ATTESTATION**

12 I, Dale J. Giali, hereby attest, pursuant to Civil Local Rule 5-1(i)(3), that concurrence in  
13 the filing of this document has been obtained from each signatory.

15 by: /s/ Dale J. Giali  
Dale J. Giali